

Sadly, I must appreciate and concur with comments from from some of the Commissioners and some of the public regarding Broadcast Localism. I've seen and heard the horror stories and watched some media outlets give only lip service to their communities of license...and their communities in general. I'm only a little surprised it took so long to be noted.

I would suggest however, that for every scofflaw and corner-cutter out there, there are a dozen or more ethical operators and I do not want to see all of us, especially we underfunded small market stations. punished due to the arrogance of a few.

I would encourage the Commission to begin by enforcing the rules we now have. Most of the abuses cited fall well within the existing limits.

Rather than addressing all the points in the NPRM, I would like to argue some of the most salient for small markets especially. I agree that long-distance voicetracking is anathema to localism. On the other hand, local voicetracking allows our afternoon drive personality - a single mom with two high school kids - to come in, do an hour or so on a quiet day and then chauffeur the kids to events and all those "Mom things". When problems occur, she's in her chair broadcasting around the clock with the rest of us. Ditto our Midday announcer who's also our Promotion Director, Music Director, etc. etc. Voicetracking allows her to take care of a lot of business for our listeners and the station rather than waiting for five hours in the studio. If it weren't for voicetracking, as an owner-operator, I wouldn't get a dinner break...you get the idea. We have a total staff of nine doing the work of twenty, all making a good deal less than in our major market jobs because we traded for quality of life...and commitment to broadcasting and to our communities.

When there's a problem, be it power outages, floods, whatever, we're here. The problem with mandatory 24-7 live personnel in the small markets is a lack of funds to adequately compensate a full crew of professionals...with voicetracking, we're able to provide both excellent community service and programming on a very tight budget...and all of our staff live within 4 miles of the station and all but one have been with us for over ten years. Except for some one and two hour nationally produced special entertainment features, all our programming is generated here...by that same small staff. We are a true community station and have received countless awards for our services, including two Crystal Awards. Voicetracking - local voicetracking - is a valuable tool that helps us accomplish all that. Frankly, a mandatory disclosure that we use an voicetracking would be detrimental to our success and community image.

On the news front, we still maintain daily local and national news, all put together by our News Director, six times a day in non-emergency times; countless more in emergency situations. Between us all, every public meeting in a geographically huge County is covered, all election returns are carried live and local until the final results are in and we meet with all the leading political and public safety officials, as well as community leaders on a regular basis. Using our toll-free listener line, our toll-free information line (The CoastLine) and our interactive website (kozt.com), we get constant

listener and citizen input. All this information is synopsised in our Quarterly Reports in the Public File.

Public service? ..The Coast gives free airtime to non-profits and community organizations valued in excess of 50% of our sales...and public service and remotes and events coverage is always free here..and on the air 3 to 4 times an hour, plus placement on both the toll-free CoastLine and our website..again, all in the Quarterly Report, so why any need for additional paperwork and documentation? Certainly, it is reasonable and just to expect us to do a decent percentage of public service and public affairs programming. Frankly, it's just good broadcasting to care for your communities. Any lack should be immediately apparent in the Quarterly Report.

Remote station operation? We certainly use it in the quiet times and have never failed to receive or act upon any emergencies, whether an Amber Alert or Tsunami or just unexpected bad weather. Any time the station is unoccupied, at least three of us, all nearby, are wired in...to the EAS, to our studio, to law enforcement and public safety, to the transmitter, all with battery backups, landline and cellphone communication. Even if the whole grid goes down, we're on it. Our longest time off air in an emergency has been under ten minutes. No call goes without immediate action on our part. Just this year alone, The Coast has been on generator power and in emergency mode in excess of 200 hours. With affordable modern technology, there is no reason for any station, anywhere not to respond immediately and responsibly. Again, enforcement of the current rules should clean up this area without imposing a difficult burden on any responsible broadcaster.

As I've already shown, we not only have a lot of input from our communities, we welcome it and use it. Having lived with the old former ascertainment policies, I can assure you our ongoing approach to community ascertainment brings a lot more meaningful results. It is worth noting that, in 17 years our Public File has been requested only twice; once by a competitor when we first entered the market and once as part of an FCC inspection (which we passed). There're always a few malcontents against pretty much everything and a lot of the dissatisfaction the Commissioners have seen in the Localism meetings has been from frustrated people who've lost their favorite station to some of the manoeuvres of some broadcasters that are rapidly seeing the need to change. Let's not punish what I feel is the majority of us responsible broadcasters for the correctable abuses of a few.

Again, I understand and concur in many parts with the comments from some of the Commissioners. I'm asking that we work with what we already have and use that as the basis to shape up the laggards and strive for a renewed belief in our stations and our industry.

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